

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ERNEST CRUMP, JR.

Plaintiff,

v.

ROBERT MAY, THOMAS RYGIL,
VINCE BIANCA, and STAN TAYLOR,
Defendants.

C.A. No. 04-329-SLR

**DEFENDANT OFFICER THOMAS RYGIL'S ¹ RESPONSE TO PLAINTIFF'S
FIRST SET OF INTERROGATORIES**

State Defendant, Officer Thomas Rygil responds to Plaintiff's First Set of

Interrogatories as follows:

1. Isn't it true that you along with the Emergency Response Team, apprehended the plaintiff on 08-29-02 and returned him back to Morris Correctional Center?

ANSWER: No.

2. Isn't it true that you, along with another correctional officer, Administratively Transferred the plaintiff on 08-30-02 from Morris Community Correctional Center to Delaware Correctional Center?

ANSWER: No.

3. Isn't it true that on 08-30-02, you personally took off the plaintiffs body the following items: his 2 rings, 2 necklaces, 1 watch, 1 pair of shoes, 1 shirt, 1 belt and pants?

ANSWER: No.

4. Isn't it true that after you took the plaintiff's personal property off his body,

¹ Plaintiff misspelled Defendant Thomas Rygil's name throughout this document. The proper spelling is "Thomas Rygiel".

you had him put in Department of Corrections clothers and sneakers?

ANSWER: No.

5. Isn't it true that none of the plaintiffs personal property, including his holy Koran, Kufi, Legalwork, Hygenic articles, or the items taken from his body by you, was transferred along with him when you administratively transferred him to Delaware Correctional Center on 08-30-02?

ANSWER: No.

6. Were you ordered by a higher authority to take the plaintiffs personal property off his body at Morris Community Correctional Center on 08-30-02?

ANSWER: No.

7. If you answered yes to interrogatory No. 6. then go to interrogatory NO. 8.

ANSWER: N/A

8. So the decision to take the plaintiffs personal property off his body was your decision?

ANSWER: No.

9. What did you do with the plaintiffs personal property that you took off his body?

ANSWER: It is denied that I personally took anything off the Plaintiff's body.

Upon information and belief detainee and offender personal property is sent to the inmate property room upon entry to a DOC facility.

10. On 08-30-02, did you have control and/or possession, at any time, over or of the plaintiff other personal property, in particular; his Holy Koran, Kufi, Legalwork and Hygenic articles?

ANSWER: No.

11. If you answered yes to interrogatory No. 10, what did you do with that property?

If you answered no to interrogatory No. 10, then go to interrogatory no. 12.

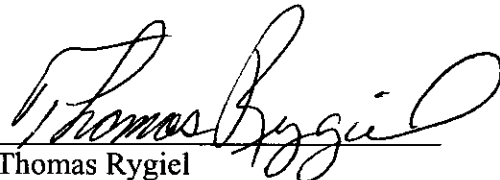
ANSWER: N/A.

12. Who had control of the property stated in interrogatory No. 10?


ANSWER: I have no personal knowledge.

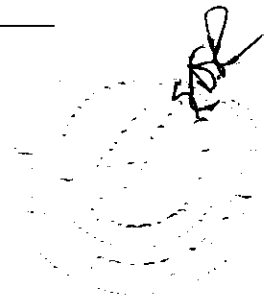
13. Isn't it true that the plaintiffs personal property, in particular his Holy Koran, Kufi, Legalwork, Hygenic articles, and his jewelry and watch taken off his body by you, could have been transferred along with him when he was administratively transferred to Delaware Correctional Center on 8-30-02?

ANSWER: It is denied that I took any personal property from the Plaintiff. Inmate property is not sent with an inmate who is being administratively transferred as a result of an escape warrant.


Thomas Rygiel

SWORN TO AND SUBSCRIBED before me this 8th, day of December,
2005.


Notary
Kent D. Raymond



CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2005, I electronically filed *State Defendant Thomas Rygiel's Answers to Plaintiff's First Set of Interrogatories*, with the Clerk of Court using CM/ECF. I hereby certify that on December 19, 2005, I have mailed by United States Postal Service, the documents to the following non-registered participant: Ernest A. Crump, Jr.; SBI #149221; Delaware Correctional Center; 1181 Paddock Road; Smyrna, DE 19977.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

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